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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 11-20203

VIO: 18 U.S.C. §1349

-VS-

HON. AVERN COHN

D-2 RYAN VINCO,

Defendant.

FIRST SUPERSEDING INFORMATION

The United States Attorney:

COUNT ONE

(18 U.S.C. §1349 – CONSPIRACY)

D-2 RYAN VINCO

1. Beginning on or about February 24, 2006, and continuing through July 29, 2008, in the Eastern District of Michigan, Southern Division, defendant **RYAN VINCO (D-2)** did knowingly and willfully combine, conspire and agree together with **RICHARD DEAN WOOLSEY (D-1)** to obtain money by false and

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U.S. DIST. COURT CLERK
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DETROIT

fraudulent pretenses from lending institutions, banks and individuals. In the process, they conspired to violate numerous federal laws, including:

Title 18, United States Code, Section 1343, Wire Fraud by knowingly executing and attempting to execute a scheme and artifice to defraud and to obtain money and funds by means of material false and fraudulent pretenses, representations and promises, and in doing so transmitted and caused the transmission of a wire communication in interstate commerce.

OBJECTS OF THE CONSPIRACY

2. **RYAN VINCO (D-2)** conspired and agreed with **RICHARD DEAN WOOLSEY (D-1)** to defraud and to obtain money and funds from lending institutions, banks, and individuals by means of material false and fraudulent pretenses, representations, and promises.

METHOD, MANNER AND MEANS

3. **RYAN VINCO (D-2)**, an employee of Detroit Commerce Bank, furthered the objects of the conspiracy in various ways. Working with **RICHARD DEAN WOOLSEY (D-1)**, **VINCO** disguised the source of down payments by, among other things, providing false verifications of Detroit Commerce Bank account balances, and issuing cashier's checks from accounts with insufficient funds. **VINCO** did this with the fraudulent intent to bolster the credit-worthiness of borrowers and to hide the source of down payments. An example of this is the

fraudulent sale of the property located at 18645 Clover Hill Court, Northville, Michigan (Clover Hill):

A. In December 2007, **RICHARD D DEAN WOOLSEY (D-1)** acted as the straw buyer of Clover Hill. **RYAN VINCO (D-2)** arranged to have a cashier's check in the amount of \$238,885.70 drawn on **WOOLSEY'S** Detroit Commerce Bank checking account which at the time had a balance of \$32.03. As both **WOOLSEY** and **VINCO's** knew and intended, the cashier's check fraudulently inflated **WOOLSEY's** apparent credit-worthiness. Later that day, **WOOLSEY** with **VINCO's**, knowledge and assistance, took the cashier check to the closing and used it for the down payment.

B. On December 14, 2007, Countrywide Home Loans approved and disbursed \$875,033.72 , by wire transfer from The Bank of New York in Alexandria, Virginia to Comerica Bank in Detroit, Michigan. This transfer funded the mortgage loan approved for **RICHARD DEAN WOOLSEY (D-1)**, to purchase Clover Hill.

[INTENTIONALLY LEFT BLANK]

4. All in violation of Title 18, United States Code, Section 1349.

Respectfully submitted,

BARBARA L. MCQUADE
United States Attorney

s/Karen L. Reynolds
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Dated: August __, 2013

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Reassignment/Recusal Information

This matter was opened in the USAO prior to August 15, 2008 []

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: <i>KLR</i>

Case Title: USA v. Ryan Vinco

County where offense occurred : Wayne and Washtenaw

Check One: ☐ Felony ☐ Misdemeanor

☐ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number:]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: 11-20203

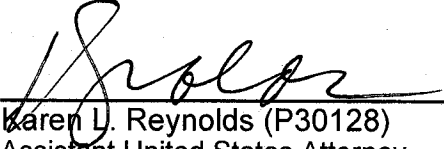
Judge: Avern Cohn

- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☒ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
Ryan Vinco	18 U.S.C. Sec 1349	Conspiracy

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

August 7, 2013
Date


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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.